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11 *Attorneys for Defendant U.S. Bank National Association and ChexSystems, Inc.*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 ROOTA SHIRINYANS,

15 Plaintiff,

16 vs.

17 BANK OF AMERICA, N.A., U.S. BANK, N.A.,
18 CHEXSYSTEMS, INC., EARLY WARNING
19 SERVICES, LLC,

20 Defendants.

Case No.: 2:25-cv-00411-GMN-EJY

21 **JOINT MOTION TO EXTEND TIME**
22 **FOR U.S. BANK, N.A. AND**
23 **CHEXSYSTEMS, INC. TO FILE**
24 **RESPONSE TO COMPLAINT**

25 **[SECOND REQUEST]**

26 Pursuant to Local Rule 7-1 and Local Rule 6-1, Plaintiff Roota Shirinyans (“Plaintiff”) and Defendants U.S. Bank National Association (“U.S. Bank”) and ChexSystems, Inc. (“ChexSystems”) (together, “Defendants”), by and through their respective undersigned counsel of record, submit this Joint Motion and Proposed Order.

27 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendants that the time for Defendants to respond to the Complaint in this action is extended to and through May 30, 2025. This is the Parties’ second request for an extension of this deadline.

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1 The Parties request this extension to permit Defendants to review the allegations and for
2 the Parties to continue their discussions regarding a possible early resolution of this case to avoid
3 unnecessary fees and costs.

4 DATED this 29th day of April, 2025.

DATED this 29th day of April, 2025.

6 /s/ Kevin L. Hernandez
7 LAW OFFICE OF KEVIN L. HERNANDEZ
8 Kevin L. Hernandez, Esq.
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10 *Attorney for Plaintiff, Roota Shirinyans*

*Attorneys for Defendants, U.S. Bank
National Association and ChexSystems, Inc.*

14 **ORDER**

15 **IT IS SO ORDERED.**

16 
UNITED STATES MAGISTRATE JUDGE

18 Dated: April 29, 2025